

**BY ORDER OF THE COMMANDER  
919TH SPECIAL OPERATIONS WING**

**919TH SPECIAL OPERATIONS WING  
INSTRUCTION 32-7002**



**18 DECEMBER 2015**

**Civil Engineer**

**AIR QUALITY COMPLIANCE AND  
RESOURCE MANAGEMENT**

**COMPLIANCE WITH THIS PUBLICATION IS MANDATORY**

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OPR: 919 SOMSG/EM

Certified by: 919 SOMSG/CC  
(Col Brian Stahl)

Supersedes: 919SOWI32-7002,  
1 April 2013

Pages: 8

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This instruction implements the provisions of Air Force Policy Directive (AFPD) 32-70, *Environmental Quality*. This instruction extends the guidance of Air Force Instruction (AFI) 32-7040, *Air Quality Compliance and Resource Management Eglin AFB Supplement to AFI 32-7040*. The purpose of this instruction is to ensure compliance with the Clean Air Act (CAA) Title V Operation Permit and provide adequate documentation to certify compliance. This instruction applies to all functional elements of the 919th Special Operations Wing (919 SOW) and its attached personnel. Refer recommended changes and questions about this publication to the Office of Primary Responsibility (OPR) using the Air Force (AF) Form 847, *Recommendation for Change of Publication*; route the AF Form 847s from the wing through your publications/forms manager. Ensure all records created as a result of processes prescribed in this publication are maintained in accordance with Air Force Manual (AFMAN) 33-363, *Management of Records*, and dispose of in accordance with the Air Force Records Disposition Schedule (RDS) located at <https://www.my.af.mil/gcss-af61a/afrims/afrims/>.

**SUMMARY OR CHANGES**

***“This document has been substantially revised and must be completely reviewed”.*** This document clarifies and updates guidance on the Eglin Air Quality Program as it applies to the 919 SOW.

**1. Definitions.**

1.1. Air Quality Program Manager (AQPM). The AQPM ensures base wide compliance with the Clean Air Act (CAA) and its amendments, the Title V Operating Permit, the Florida Department of Environmental Protection (FDEP) Air Rules and Regulations, and Air Force Policy and Regulations. The 96th Civil Engineer Group (96 CEG) Air Quality Program Management contact information is, (CEIEC, DSN 872) 882-7677.

1.2. Air Source Manager (ASM). Individuals are assigned by the 919 SOW Commander (CC) with the responsibility for the compliance of air emission sources owned and operated by the 919 SOW.

1.3. Air Source Operator (ASO). Individual assigned to operate a particular air emissions source on a regular basis, with specific assigned duties from the ASM.

1.4. Air Emission. An air emission is any discharge of an air pollutant as defined in the CAA Amendments of 1990 section 302(g). Sources discharging emissions into the atmosphere are: smokestacks, other vents, surface areas of commercial or industrial facilities from residential chimneys, and from the exhausts of motor vehicles, locomotives, or aircraft.

1.5. Air Emission Inventory. A detailed listing of all stationary sources owned and operated by the 919 SOW as identified by AQPM.

1.6. National Emission Standards for Hazardous Air Pollutants (NESHAP). 919 SOW currently falls under the Aerospace NESHAP, which regulates hazardous air pollutants (HAPs) generated by aerospace manufacturing and rework operations (e.g., hand-wipe cleaning, spray gun cleaning, flush cleaning, depainting, and primer/topcoat applications).

1.7. New Source. Any stationary air emission source built or modified after publication of final or proposed regulations that prescribes a standard of performance intended to apply to that type of air emission source.

1.8. Operating Permit. Permit issued in accordance with Title V of the 1990 CAA Amendments by the FDEP to allow the 919th Special Operations Maintenance Group (919 SOMXG), under given conditions, to operate specific stationary air emission sources.

1.9. Source Owner. Any workplace owning a particular air emission source.

1.10. Stationary Air Emission Source. A fixed, non-moving producer of pollution, such as power plants, facilities using industrial combustion processes, paint spray booths, fuel storage tanks, and solvent cleaning facilities.

1.11. Air Source Operators (ASO). Individuals assigned by the workplace supervisor to operate a particular air emission source on a regular basis with specific assigned duties from the ASM. ASO's are normally supervisors but this duty may be delegated by the supervisor to other responsible personnel.

## **2. Procedures.**

### **2.1. Maintain Air Emission Source Inventory.**

2.1.1. Notify the ASM, in advance, of the initiation of procedures to modify or replace existing air emission sources or to acquire a new air emission source.

2.1.2. The ASM will:

2.1.2.1. Review and validate physical and operational data for all air emission sources owned and operated by the 919 SOW as identified by the AQPM.

2.1.2.2. Notify the AQPM of any discrepancies found during each review.

2.1.2.3. Maintain copy of current inventory of air emission sources owned and operated by the 919 SOW.

2.1.3. Apply For and Maintain Permit.

2.1.3.1. The ASM will consult the AQPM during the planning process to determine whether permitting is required for any proposed new, modified, or replacement air emission source.

2.1.3.2. In the event that permitting is required, the ASM will work with the project proponent, complete necessary permit application forms and forward the application to the AQPM for review and submittal to the FDEP.

2.1.3.3. Post a copy of the permit issued by FDEP on the permitted source or at a location accessible to operators and FDEP regulators. The current operating permit is available at the 919 SOW Environmental Office.

2.1.4. Record Keeping.

2.1.4.1. The ASO of any stationary air emission source that is subject to the Title V operating permit or the Aerospace NESHAP will maintain an air emissions section in their environmental continuity book for recordkeeping and checklists. The ASO is responsible for ensuring changes to an air emission source (i.e., new equipment, chemical change, and process change) are documented.

2.1.4.2. The 919 SOW Issue Point (IP53) or the ASM will supply a monthly chemical use report to the ASO. The ASO will maintain a record of chemicals not supplied by the IP53.

2.1.4.3. The ASM will periodically review air emission continuity books to ensure that records and checklists are correctly maintained for each stationary source.

2.1.5. Reporting.

2.1.5.1. The AQPM will identify emission sources that require monthly reporting. The ASM will collect monthly emissions monitoring data from ASO, review for completion, and forward them to the AQPM by the 10th calendar day of each month. The ASM will maintain a record copy of each report.

2.1.5.2. 919 MXG will submit the Aerospace NESHAP compliance certification reports semi-annually to the AQPM. Submit a non-compliance certification report along with an approved corrective action plan if a non-compliant condition is found.

2.1.5.3. 919 SOW will submit a Title V Air Operation Permit compliance certification report annually to the AQPM. If a non-compliance condition is found, submit a non-compliance certification report along with approved corrective action plans.

2.1.5.4. Corrosion Control ASO will maintain a log listing the differential pressure for each shift (paint booth manometer) and maintain the log for a period of 5 years, making the log available upon request to 96 CEG/CEIEC.

#### 2.1.6. Compliance Certification.

2.1.6.1. The Aerospace NESHAP compliance certification is a semi-annual report verifying that 919 MXG has operated in full compliance with the terms and conditions of the operating permit. The Title V Air Operation Permit compliance certification report is an annual report verifying that the 919 SOW has operated in full compliance with the terms and conditions of Title V Air Operation Permit.

2.1.6.2. The ASM will conduct a review of all regulated stationary air emission sources before the certification. The review will consist of interviewing ASO, reviewing monitoring logs/reports, and/or researching data from the Enterprise Environmental Safety and Occupational Health – Management Information System (EESOH-MIS).

2.1.6.3. ASO will initiate a letter, certifying that their stationary air emission source complied or did not comply with the terms and conditions of the Title V Air Operation Permit during the compliance certification period. The ASM will compile these certifications into a letter report for the 919 SOMXG/CC's signature. Forward the compliance certification letter report to the AQPM.

#### 2.2. Stationary Source Operation.

##### 2.2.1. Operating Conditions.

2.2.1.1. The ASM will ensure that ASO have posted the operating conditions at each stationary air emission source. Post the operating conditions in a highly visible location, accessible to operators as well as regulators.

2.2.1.2. The ASM will notify the ASO of any changes to the operating conditions for their stationary air emission source. The ASM will review the operating conditions for all the stationary air emission sources at least semi-annually.

##### 2.2.2. Operational Checklist.

2.2.2.1. Operational checklists will have as a minimum, all applicable requirements of the operating permit. Each stationary air emission source that is subject to the Title V operating permit will maintain an air emissions section in the shop environmental continuity book for checklists. The AQPM has checklists for air emission sources available at this website: [https://em.eglin.af.mil/emc/emce/emcea/aqpweb/compliance\\_chklsts.asp](https://em.eglin.af.mil/emc/emce/emcea/aqpweb/compliance_chklsts.asp).

2.2.2.2. The ASM will coordinate with the AQPM to develop unique operational checklists if more detail is necessary.

2.2.2.3. In case of a change to an operating condition, the ASO will notify the ASM and the AQPM immediately.

##### 2.2.3. Inspections.

2.2.3.1. “Finally, the annual Stage II Environmental Inspection will evaluate stationary air emission sources for discrepancies.” to something like, “Finally, Inspector General inspections, including the Commander Effectiveness Inspection, generally evaluate air emission sources for discrepancies.”

2.2.3.2. Report all discrepancies to the ASM.

#### 2.2.4. Certify Operational Compliance.

2.2.4.1. Procedures for the compliance certification will include:

2.2.4.1.1. ASM/alternate interviews ASO regarding air emission source(s) operations to include material use, waste handling, operations, control equipment, and air monitoring/sampling.

2.2.4.1.2. ASM/alternate reviews recordkeeping for all air emission sources.

2.2.4.1.3. ASO verifies conformity to the Title V Operating Permit by endorsing the Compliance Certification for Individual Emission Units statement.

2.2.4.1.4. ASM and the two-letter affected source owner (919 SOMXG/CC) complete endorsement of the Organization Compliance Certification.

2.2.4.1.5. 919 SOMXG/CC reviews and signs final certification letter to 96 CEG/CEIEC.

2.2.4.2. If a non-compliant condition is found, submit a non-compliance certification report along with approved corrective action plans to 96 CEG/CEIEC. Corrective action plans will be coordinated with the AQPM to ensure they satisfy the requirements of the Title V Operation Permit.

#### 2.2.5. Install and Maintain Control Equipment.

2.2.5.1. The ASM will review equipment inventories, operating permit requirements, and coordinate with the AQPM to determine air emission sources requiring control devices and compliance dates for implementation.

2.2.5.2. ASO will incorporate control equipment funding requirements into the 919 SOMXG budget.

2.2.5.3. ASO will ensure control devices are operated and maintained in accordance with the operating permit and manufacturer’s specifications, ensuring zero violations of emission standards.

#### 2.3. Training Requirements.

2.3.1. Training and retraining of 919 SOMXG personnel is essential to ensure and maintain compliance with the Title V Operating Permit. The ASM will develop, with the assistance of the AQPM, procedures to ensure all personnel receive training based on their responsibilities. Training will recur on an “as needed” basis.

2.3.2. ASO will document training in personnel training records. ASO will ensure that new personnel are adequately trained about monitoring, recordkeeping, and reporting requirements for permitted sources before new personnel operate the equipment.

2.3.3. ASO will ensure personnel that require special licensing and/or certification (e.g., air conditioner servicing, wastewater treatment) receive training meeting the requirements of the Operating Permit. ASO will ensure all certifications are maintained in accordance with the Operating Permit.

2.3.4. Before operating new equipment, ASO will coordinate training and certification requirements with the AQPM and the ASM.

2.3.5. The SOMXG will maintain the following levels of training:

2.3.5.1. General Awareness (Category 3). Violations of Operating Permit requirements by personnel could result in civil and/or criminal penalties. This training includes basic knowledge of the compliance requirements of the Title V Operating Permit for all 919 SOMXG maintenance personnel as necessary to ensure personnel are aware of the strict rules governing stationary source air emissions. The AQPM has a training video that meets the Category 3 criteria.

2.3.5.2. Source Operator (Category 2). In addition to general awareness training, source operator training also requires awareness level training in the following areas: Introduction to the CAA and its amendments, permit process and conditions, source operation and maintenance requirements, recordkeeping and reporting. The AQPM has a training video that meets the category 2 criteria.

2.3.5.3. ASM/Alternate (Category 1). Requires the above levels of training, plus in-depth descriptions of all requirements under the CAA, to state-specific rules to include the Title V Operating Permit. The AQPM will notify ASM when this training becomes available.

2.3.6. Training and retraining of personnel is essential to ensure and maintain compliance with the Title V Operating Permit. The ASM will develop, with the assistance of the AQPM, procedures to ensure all personnel receive training based on their responsibilities. Training for General Air Quality Awareness, module AQC-1, must be taken at least once; all other modules require refresher training on a recurring basis not to exceed 15 months. 96 CEG/CEIEC provides web training that can be accessed through the Air Quality Compliance Training: <https://em.eglin.af.mil/emc/emce/emcea/aqpweb/index.asp>.

JAMES M. PHILLIPS Col, USAFR  
Commander

**Attachment 1****GLOSSARY OF REFERENCES AND SUPPORTING INFORMATION*****References***

AFPD 32-70, *Environmental Quality*, 20 July 1994

AFI 32-7040, *Air Quality Compliance and Resource Management*, 27 August 2007

AFI 32-7040 EAFB Supp, *Air Quality Compliance and Resource Management*, 3 May 2012.

AFMAN 33-363, *Management of Records*, 1 March 2008

Eglin Title V, *Air Operations Permit* 1 June 2009

***Adopted Forms***

AF Form 847, *Recommendation for Change of Publication*, 22 Sep 2009

***Abbreviations and Acronyms***

**AF**—Air Force

**AFI**—Air Force Instruction

**AFMAN**—Air Force Manual

**AFPD**—Air Force Policy Directive

**AQPM**—Air Quality Program Manager

**ASM**—Air Source Manager

**ASO**—Air Source Operators

**CAA**—Clean Air Act

**CC**—Commander

**CES**—Civil Engineer Squadron

**CEIEC Environmental**—

**DSN**—Defense Switched Network

**ECAMP**—Environmental Compliance Assessment Management Program

**EESOH-MIS**—Enterprise Environmental Safety and Occupational Health–Management Information System

**FDEP**—Florida Department of Environmental Protection

**HAP**—Hazardous Air Pollutants

**IP53**—919 SOW Issue Point

**SOMXG**—Special Operations Maintenance Group

**NESHAP**—National Emission Standards for Hazardous Air Pollutants

**OPR**—Office of Primary Responsibility

**RDS**—Air Force Records Disposition Schedule

**SOW**—Special Operations Wing